

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

4 lindsaycooper@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

5 San Francisco, California 94111-4788

Telephone: (415) 875-6600

6 Facsimile: (415) 875-6700

7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS ANSWER TO SONOS,  
INC.'S AMENDED COUNTERCLAIMS**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Google’s Administrative Motion to File Under Seal Portions of its Answer to Sonos, Inc.’s (“Sonos”) Amended Counterclaims (“Answer”). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions to be Filed Under Seal	Designating Party
Google’s Answer	Portions highlighted in green	Google
Exhibit 2 to Google’s Answer	Entire Document	Google
Exhibit 3 to Google’s Answer	Entire Document	Google

4. The portions of Google’s Answer highlighted in green contain confidential business information and terms to confidential agreements that are not public. Public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to Google’s highly confidential business thinking and asymmetrical information about Google’s collaboration strategies to other entities. If such information were made public, I understand that Google’s competitive standing would be significantly harmed. I also understand that a less restrictive alternative than sealing the green-highlighted portions of Google’s Answer would not be sufficient because the information sought to be sealed is Google’s proprietary and confidential business information but is necessary to the affirmative defenses in Google’s Answer.

5. Exhibit 2 contains confidential business information and terms to confidential agreements that are not public. Public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to



**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: April 1, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven